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March 10, 2015

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Commissioner Ajit Pai
Commissioner Jessica Rosenworcel
Commissioner Michael O'Rielly
Federal Communications Commission
445 112th Street, S.W.
Washington, D.C. 20554

Re: Comcast-TimeWarner Cable: Proceeding #14-57

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Pai, Commissioner Rosenworcel and Commissioner O'Rielly:

As Ventura County Supervisor representing the First District, I am writing to you today to urge you to secure a public benefit from the proposed Comcast acquisition of Time Warner Cable (TWC) and trade of service territory with Charter Communications in the form of the 5 Recommendations below to ensure acceptable performance on the Comcast affordable offer called Internet Essentials (CIE).

1. **Include All Low-Income Households:** Extend Comcast Internet Essentials to all low-income households, not just those with school children. Require Charter and all companies resulting from corporate mergers or acquisitions to offer a similar affordable offer to all low-income households. Low-income seniors, people with disabilities and returning veterans are not covered today.
2. **Set Performance Goals:** Set a goal for Comcast to increase Internet Essentials subscribership for expanded eligible households to reach 45% in 2 years, and to continue the program until 80% adoption is achieved in all low-income neighborhoods in each major market within the combined service territories. Set a similar goal for Charter and all other companies.
3. **Capitalize an Independent Fund and Coordinate with States:** Work through and collaborate with states that have an adopted plan to close the Digital Divide. In states, such as California, that are major Comcast-TWC markets and have a strategic plan to close the Digital Divide, require Comcast to dedicate a sufficient amount to an



independently-managed fund to engage experienced community-based organizations, libraries and schools to assist in achieving the 45% subscription sign-ups and overall 80% adoption rate. Apply this same approach to states that become dominant Charter markets. The management of such a fund should be selected by a state agency through an open competitive process.

4. **Establish an Advisory Oversight Committee:** Establish a national advisory oversight committee to provide feedback and input to the FCC in monitoring performance and progress. The program has been riddled with problems and there is a lack of transparency on data regarding eligibility and progress. There must be a reliable process and mechanism for public accountability.
5. **Offer Stand-Alone Internet Service:** Require Comcast, Charter and other merged companies to offer all consumers the opportunity to purchase stand-alone Internet access at a reasonable rate instead of being forced to pay for bundled services.

I am very concerned about the increasing disparities across our country with a full quarter of the population being stuck on the wrong side of the Digital Divide and being left behind at an accelerating pace. The United States cannot be competitive globally with so many of its people unable to participate fully in the economy nor reach their highest potential for creativity and productivity.

Now is the time to hold Comcast accountable for delivering a real, measurable public benefit. In fact, the same requirements should be a condition of all pending corporate mergers or acquisitions. Our nation's economic well-being and ability to compete globally are at risk unless we get all residents connected to high-speed Internet access at home. You have all the power and authority to ensure that every American has access to affordable, high-quality internet service.

Sincerely,



Steve Bennett
Supervisor, First District